

RUSS, AUGUST & KABAT  
Marc A. Fenster, State Bar No. 181067  
[mfenster@raklaw.com](mailto:mfenster@raklaw.com)  
Neil A. Rubin, State Bar No. 250761  
[nrubin@raklaw.com](mailto:nrubin@raklaw.com)  
James S. Tsuei (CA Bar No. 285530)  
[jtsuei@raklaw.com](mailto:jtsuei@raklaw.com)  
12424 Wilshire Boulevard, 12th Floor  
Los Angeles, California 90025  
Telephone: (310) 826-7474  
Facsimile: (310) 826-6991

Attorneys for Plaintiff  
**COREPHOTONICS, LTD.**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

COREPHOTONICS, LTD.

Case No. 3:17-cv-06457-JD (Lead)  
Case No. 5:18-cv-02555-JD

Plaintiff,

VS

APPLE INC.

**Defendant.**

**PLAINTIFF COREPHOTONICS, LTD.'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL:**

- (1) PORTIONS OF ITS OPPOSITION TO APPLE INC.'S MOTION TO AMEND ANSWER;
  - (2) PORTIONS OF DECLARATION OF BRIAN D. LEDAHL IN SUPPORT OF ITS OPPOSITION TO APPLE INC.'S MOTION TO AMEND ANSWER; and
  - (3) ENTIRETY OF EXHIBIT 1 TO DECLARATION OF BRIAN D. LEDAHL IN SUPPORT OF ITS OPPOSITION TO APPLE INC.'S MOTION TO AMEND ANSWER

In accordance with Civil L.R. 7-11 and 79-5, Plaintiff Corephotonics, Ltd. (“Corephotonics”) respectfully seeks a narrowly-tailored Order authorizing the sealing of portions of its concurrently filed Opposition to Apple, Inc.’s Motion to Amend Answer and supporting papers, namely:

1. Highlighted portions of Corephotonics' Opposition to Apple Inc.'s Motion to Amend Answer;
  2. Highlighted portions of Declaration of Brian D. Ledahl in Support of Corephotonics' Opposition to Apple Inc.'s Motion to Amend Answer; and
  3. Entirety of Exhibit 1 to Declaration of Brian D. Ledahl in Support of Corephotonics' Opposition to Apple Inc.'s Motion to Amend Answer.

As set forth in the accompanying Declaration of James S. Tsuei, the highlighted material in Items 1-3 includes confidential information relating to Corephotonics' patent licensing activity. Compelling reasons and good cause exist to permit Corephotonics to file that information under seal, as the public disclosure of that information would pose irreparable harm not only to Corephotonics but also potentially to third parties involved in Corephotonics' licensing activity.

Corephotonics has reviewed and complied with the Court's Standing Order Governing Administrative Motions to File Materials Under Seal and Civil Local Rule 79-5.

For the reasons set forth above, Corephotronics respectfully requests that the Court grant an Order allowing Corephotronics to file the highlighted portions of the above documents under seal.

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1 By: */s/ Marc A. Fenster*  
2 Marc A. Fenster (CA Bar No. 181067)  
3 Neil A. Rubin (CA Bar No. 250761)  
4 James S. Tsuei (CA Bar No. 285530)  
5 RUSS AUGUST & KABAT  
6 12424 Wilshire Boulevard, 12<sup>th</sup> Floor  
7 Los Angeles, California 90025  
8 Telephone: (310) 826-7474  
9 Facsimile: (310) 826-6991  
10 [mfenster@raklaw.com](mailto:mfenster@raklaw.com)  
11 [nrubin@raklaw.com](mailto:nrubin@raklaw.com)  
12 [jtsuei@raklaw.com](mailto:jtsuei@raklaw.com)

13 Attorneys for Plaintiff  
14 Corephotonics, Ltd.  
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**CERTIFICATE OF SERVICE**

I certify that counsel of record who are deemed to have consented to electronic service are being served on November 20, 2023, with a copy of this document via the Court's CM/ECF systems per Local Rule CV-5(a)(3). Any other counsel will be served by electronic mail, facsimile, overnight delivery and/or First Class Mail on this date.

*/s/Marc Fenster*

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